

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JASON NOLIN, individually; TERRI EWING,
individually,

Plaintiffs,

v.

PV HOLDING CORPORATION, a Massachusetts
corporation; LINDSAY A. DOHERTY and "JOHN
DOE" DOHERTY, wife and husband,

Defendants.

No.

COMPLAINT FOR INJURIES AND
DAMAGES IN TORT

The plaintiffs, by and through their attorney of record, Jeffrey Sadler, of SADLER
INJURY LAW GROUP, LLP, alleges and complains as follows:

I. PARTIES

1.1 Defendant PV HOLDING CORPORATION, a Massachusetts corporation,
was at all times licensed to do and doing business in Massachusetts and/or Missouri.
Defendant was the owner of the 2018 Chevrolet Malibu involved in the hereinafter-described
collision. Defendant PV Holding Company entrusted Defendant Lindsay Doherty with use of
the vehicle.

1 1.2 Defendants LINDSAY A. DOHERTY and "JOHN DOE" DOHERTY were,
2 at all times, residents of Michigan and were husband and wife pursuant to the laws of
3 Michigan. Defendant Doherty was the driver of the 2018 Chevrolet Malibu involved in the
4 hereinafter-described incident.

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6 1.3 At all times relevant hereto, Defendant Lindsay A. Doherty was an agent for
7 PV Holding Corporation.

8 1.4 Plaintiff Jason Nolin was, at all times relevant hereto, a resident of Pierce
9 County, Washington. Jason Nolin was a passenger in the 1999 Ford Club Wagon E350
10 passenger van involved in the hereinafter-described collision.

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12 1.5 Plaintiff Terri Ewing was, at all times relevant hereto, a resident of Pierce
13 County, Washington. Terri Ewing was a passenger in the 1999 Ford Club Wagon E350
14 passenger van involved in the hereinafter-described collision.

15 **II. JURISDICTION AND VENUE**

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17 2.1 This court has jurisdiction over the subject matter and the parties involved
18 herein pursuant to diversity jurisdiction as set forth in Title 28, Section 1332 of the United
19 States Code (28 U.S.C. § 1332(a)), as the amount in controversy exceeds \$75,000.00 and
20 there is complete diversity of citizenship among the parties.

21 **III. FACTS**

22
23 3.1 On or about March 16, 2018, Plaintiffs Jason Nolin and Terri Ewing were
24 passengers in the Ford E350 driving at the intersection of West 31st Street and Southwest
25 Trafficway in Jackson County, Kansas City, Missouri.

26 3.2 Defendant Doherty was driving directly behind the vehicle in which the
27 plaintiffs were passengers.

3.3 Defendant Doherty failed to stop her vehicle and collided with the rear end of the plaintiffs' vehicle.

3.4 Defendant caused injury to Plaintiff Jason Nolin and Terri Ewing.

IV. DAMAGES

4.1 As a direct and proximate result of the collision and because of the negligent acts and omissions on part of Defendants, Plaintiffs suffered bodily injury causing special and general damages.

4.2 As a direct and proximate result of the collision and because of the negligent acts and omissions of Defendants, Plaintiffs incurred medical expenses and other special expenses in an amount to be proven at the time of trial.

WHEREFORE, Plaintiffs pray for judgment against the defendants as follows:

1. For medical expenses and future medical expenses incurred as a result of the collision caused by the negligence of the defendants;

2. For general damages incurred as a result of the accident caused by the negligence of Defendants, in an amount to be proven at the time of trial;

3. For special damages in an amount to be proven at the time of trial;

4. For costs and disbursements herein to be expended; and

5. For such other and further relief as the court deems just and equitable.

DATED this 4th day of March, 2021.

SADLER INJURY LAW GROUP, LLP

By: /s/Jeffrey Sadler

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